

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

UNITED STATES

V.

MICHAEL PRIETO

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* Criminal No. 12-CR-31-01-SM

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ASSENTED TO MOTION TO AMEND SURRENDER DATE

NOW COMES the Defendant, Michael Prieto, by and through his counsel, Michael J. Iacopino, Esq., and Brennan, Caron, Lenehan & Iacopino, and respectfully moves this Court to amend the Defendant's surrender date in the above captioned matter.

IN SUPPORT OF THIS MOTION, the Defendant submits as follows:

1. On March 10, 2014, the Defendant was sentenced to a term of 72 months. He was ordered to self-surrender before 2:00 p.m. on April 5, 2014.
2. Undersigned counsel has discussed this surrender date with the United States Marshal's Office. The United States Marshal's Office indicated that April 5, 2014, was a Saturday. Undersigned counsel was advised by the Marshal's Office that Saturdays are not appropriate days for self-surrender because the administrative staff at most federal prison facilities is either off for the weekend or substantially depleted over the weekend. In addition, undersigned counsel was advised by both the Marshal's Office and the Clerk's Office that the Bureau of Prisons prefers self-surrenders to occur on Fridays.

3. In addition to the foregoing, undersigned counsel learned today that the Defendant has been designated to a specific United States Bureau of Prisons facility. However, the Defendant will need additional time to make travel arrangements to that facility.

4. Therefore, the Defendant respectfully moves that this Court amend his surrender date so that he may self-surrender on Friday, April 18, 2014, before 2:00 p.m. at the designated facility.

5. Undersigned counsel has discussed the relief contained in this request with Assistant United States Attorney Mark Zuckerman who has indicated that the Government does not object to this Motion.

WHEREFORE, the Defendant respectfully moves this Court grant the following relief:

A. Grant this Motion and amend the surrender date for the Defendant until April 18, 2014, at a time before 2:00 p.m.; and,

B. Grant such further relief as may be just.

Respectfully submitted,
Michael Prieto, Defendant
By his Attorneys,
BRENNAN, CARON, LENEHAN & IACOPINO

Date: April 1, 2014

By: /s/ Michael J. Iacopino
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion to Amend Surrender Date was served on the following persons, even date herewith, and in the manner specified herein: electronically served through ECF: Assistant United States Attorney Mark Zuckerman, United States Attorney's Office, James C. Cleveland Federal Bldg., 55 Pleasant Street, Room 352, Concord, NH 03301-3941.

/s/ Michael J. Iacopino
Michael J. Iacopino, Esq.